

EXHIBIT

A

Cjf8.24.20
CDA/JTW
USAO#2019R00502

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CRIMINAL NO. JKB-20-0268

WESLEY CLASH,
DASHELLE CLARIDY,
VINCENT DAVIS,
[REDACTED]

[REDACTED],
[REDACTED],

Defendants.

(Conspiracy to Distribute and
Possess with Intent to Distribute
Controlled Substances, 21 U.S.C.
§ 846; Possession with Intent to
Distribute Controlled Substances, 21
U.S.C. § 841(a); Aiding and Abetting,
18 U.S.C. § 2; and Forfeiture, 21
U.S.C. § 853, 28 U.S.C. § 2461(c))

UNDER SEAL

INDICTMENT

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances

The Grand Jury for the District of Maryland charges:

From a date unknown to the Grand Jury but no later than July 2019 and continuing until
the date of Indictment, in the District of Maryland, the defendants,

WESLEY CLASH,
DASHELLE CLARIDY,
VINCENT DAVIS,
[REDACTED],
[REDACTED] [REDACTED],
[REDACTED],

did knowingly combine, conspire, confederate, and agree with persons known and unknown to the
Grand Jury to distribute and possess with the intent to distribute 400 grams or more of a mixture

or substance containing fentanyl, a Schedule II controlled substance; 280 grams or more of a mixture or substance containing cocaine base, a Schedule II controlled substance, and a quantity of a mixture or substance containing cocaine hydrochloride, a Schedule II controlled substance.

21 U.S.C. § 846; 21 U.S.C. § 841(b)(1)(A)(iii); 21 U.S.C. § 841(b)(1)(A)(vi); 21 U.S.C. § 841(b)(1)(C)

COUNT TWO
Possession with Intent to Distribute Controlled Substances

The Grand Jury for the District of Maryland charges:

On or about August 1, 2019, in the District of Maryland, the defendant,

[REDACTED],

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing fentanyl, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1); 21 U.S.C. § 841(b)(1)(C)

COUNT THREE
Possession with Intent to Distribute Controlled Substances

The Grand Jury for the District of Maryland charges:

On or about December 17, 2019, in the District of Maryland, the defendants,

**WESLEY CLASH
and
DASHELLE CLARIDY,**

did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture or substance containing fentanyl, a Schedule II controlled substance; 28 grams or more of a mixture or substance containing cocaine base, a Schedule II controlled substance; and a quantity of a mixture or substance containing cocaine hydrochloride, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1); 21 U.S.C. § 841(b)(1)(B)(iii); 21 U.S.C. § 841(b)(1)(B)(vi); 21 U.S.C. § 841(b)(1)(C)

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendants' convictions.

Narcotics Forfeiture

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in the Narcotics Counts (Counts One, Two, and Three) in the Indictment, the defendants convicted of such offenses, shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offenses.

Robert K. Hur/cda

Robert K. Hur
United States Attorney

A TRUE BILL:

Foreperson

8/25/2020

Date